

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES and EXCHANGE
COMMISSION,
Plaintiff

v.

20-CV-00007-LGS-KHP

STEVE M. BAJIC,
RAJESH TANEJA,
NORFOLK HEIGHTS LTD.,
FOUNTAIN DRIVE LTD.,
ISLAND FORTUNE GLOBAL LTD.,
CRYSTALMOUNT LTD.,
WISDOM CHAIN LTD.,
SSID LTD.,
SURE MIGHTY LTD.,
TAMARIND INVESTMENTS INC.,
KENNETH CIAPALA,
ANTHONY KILLARNEY,
BLACKLIGHT SA,
CHRISTOPHER LEE MCKNKIGHT, and
AARON DALE WISE,
Defendants

**DECLARATION OF TOR EKELAND IN SUPPORT OF MOTION FOR ATTORNEY
WITHDRAWAL**

I, Tor Ekeland, hereby declare under the penalty of perjury, under the laws of the United States, the following:

1. Our firm, Tor Ekeland Law, PLLC ("The Firm"), represents Defendant Rajesh Taneja ("Mr. Taneja") in the above captioned matter.
2. I am the only attorney from The Firm on the docket in this case.
3. I am the only attorney who has ever represented Mr. Taneja in this matter.
4. I seek withdrawal from this matter due to non-payment from Mr. Taneja.

5. The Firm cannot continue to afford to continue representing Mr. Taneja.
6. Mr. Taneja has not paid The Firm since July 28, 2020.
7. Mr. Taneja currently owes the firm roughly \$171,000.
8. Mr. Taneja is currently in a foreign country outside the jurisdiction of this Court and the United States Government.
9. The Firm does not seek to enforce any lien against Mr. Taneja.
10. Mr. Taneja is aware of The Firm's withdrawal from this matter and has acknowledged consent of my withdrawal via email dated September 11, 2023.
11. The Firm has sent a copy of the Motion for Withdrawal to Mr. Taneja via email, which is the only reasonable means of reaching Mr. Taneja while he is outside of the United States.

DATED: November 7, 2023
Brooklyn, NY

DocuSigned by:

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Tor Ekeland